

REMARKS

Upon entry of the present Amendment B, claims 1-16 remain in the application. Of these, claims 1, 7, 11 and 15 are independent. Claims 1, 5, 7, 11 and 15 are amended herein. The amendments are clearly supported in the specification, whereby no new matter is added to the application.

The above-identified Office Action has been reviewed, the references carefully considered, and the Examiner's comments carefully weighed. In view thereof, the present Amendment A is submitted. It is contended that by the present amendment, all bases of rejection set forth in the Office Action have been traversed and overcome. Accordingly, reconsideration and withdrawal of the rejection is respectfully requested.

IN THE CLAIMS

Claim Rejections – 35 USC 103

Claims 1-3

At item 3 of the Office Action, the Examiner rejected claims 1, 2 and 3 under 35 USC § 103(a) as unpatentable over Adam et al. (US 6,010,403) in view of Aoki et al. (JP 2002-297017). In the rejection, the Examiner states that Adam et al. discloses an interactive driving simulation that allows a driver to simulate driving a two-wheeled vehicle, wherein the driving simulator displays performance evaluation comments on a display which displays the driving situation and the evaluation comments when the driving situation is replayed. The Examiner claims that Aoki et al. discloses an apparatus capable of recording a driving route sequence and replaying the sequence after the real-time simulation is completed. The Examiner claims it would have been obvious to incorporate the recording and playback feature of Aoki et al. with the disclosure of Adam et al. to make Applicant's invention obvious.

Applicant's Response

Applicant respectfully disagrees with the rejections of claims 1, 2 and 3. Upon review of Adam et al. Applicant finds that the '403 patent discloses a video game race car simulation system 10 wherein audio/video commands are selected based on pre-determined interactive events. (col. 5, lines 45-53) and displayed on the current view screen (box 47 of Fig. 4). Adam et al. does not disclose displaying superimposed text of performance evaluation comments based on operator input as disclosed by Applicant's invention, rather it discloses an audio commentary (col. 6, line 10-12). Applicant disagrees with the Examiner's claim that Adam et al. discloses a display unit which simultaneously displays the simulated operating environment and the superimposed text of performance evaluation comments when the driving simulation is replayed on the display unit, as claimed. In particular, Adam et al. does not disclose superimposing text or images comprising performance evaluation comments on the video image of the recording of the corresponding action by the rider during a simulated operation. Instead, Adam clearly discloses that while the video image is replayed, there may be verbal commentary (col.6, lines 10-12), whereby the comments are spoken, not displayed. Applicant respectfully submits that Applicant's invention is distinct in that it discloses displaying text of the performance evaluation comments on a display as shown in Figs. 10-13. Further, Applicant submits that the combination of Adam et al. and Aoki et al. is not obvious. Adam et al. is directed to a video game system used primarily for entertainment. To combine a system intended for entertainment with an instructional system such as that disclosed by Aoki et al. is not obvious.

Additionally, Applicant argues that the disclosure of Adam et al. of an audio commentary (col.6, lines 10-12), actually teaches away from the text display as disclosed in Applicant's invention. The audio commentary is preferred (col. 6, line 10) in the video game of Adam et al.

because it is less distracting than displaying text on the screen while a user is operating a vehicle in real-time within the game. In contrast, the text display disclosed in Applicant's invention occurs during playback of the real-time recording therefore, text causes no distraction to the operator. Thus, Applicant disagrees that the limitations of claims 1, 2 and 3 are made obvious by the combination of Adam et al. and Aoki et al., and respectfully requests reconsideration and withdrawal of the rejections thereof.

Teaching Away is Evidence of Non-Obviousness

The Court of Appeals for the Federal Circuit has established that a prima facie case of obviousness can be rebutted if Applicant . . . can show 'that the art in any material respect taught away' from Applicant's invention." *In re Geisler*, 116 F.3d 1465, 1469, 43 USPQ2d 1362, 1365 (CAFC 1997). "A reference may be said to teach away when a person of ordinary skill, upon reading the reference, . . . would be led in a direction divergent from the path that was taken by Applicant." *Tec Air, Inc. v. Denso Mfg. Mich. Inc.*, 192 F.3d 1353, 1360, 52 USPQ2d 1294, 1298 (CAFC 1999), *In re Haruna*, 249 F.3d 1327; 58 U.S.P.Q.2D 1517 (CAFC 2001).

While it is Applicant's position that the Examiner has not established prima facie obviousness of any of the present claims under 35 USC § 103(a), Applicant also respectfully submits that the clear preference for an audio commentary disclosed by Adam et al. *teaches away* from Applicant's Applicant's invention, which displays text of the performance evaluation on the screen. Since Adam et al. teaches away from Applicant's Applicant's invention, instead of rendering Applicant's claims obvious, Adam et al. actually *provides evidence of non-obviousness* of Applicant's invention.

Claim 4

At item 4 of the Office Action, the Examiner rejected claim 4 under 35 USC § 103(a) as

unpatentable over Adam et al. (US 6,010,403) / Aoki et al. (JP 2002-297017) in further view of Scott et al. (US 2004/0009812). The Examiner claims that Adam et al./Aoki et al. disclose all the aspects of Applicant's invention with the exception of a display unit capable of pausing a replay of the display image. The Examiner further claims that Scott et al. discloses a display unit operable to pause the replay of the real-time action and display a still-screen image.

Applicant's Response

The Applicant disagrees with the rejection of claim 4 for the reasons presented above with respect to claim 1, from which claim 4 depends. Particularly, Applicant notes that neither Adam et al. nor Aoki et al. disclose displaying performance evaluation text on the display to provide feedback to the user as is disclosed by Applicant's invention (Figs. 10-13). In addition, Applicant disagrees that it would be obvious for one skilled in the art to combine the teachings of Scott et al. with the disclosures of Aoki et al. and Adam et al. Applicant respectfully submits that the Scott et al. reference is not analogous art. Scott et al. discloses a system where live video feeds of horse racing can be replayed at the command of a user. Applicant submits that a reference is not reasonably pertinent to a problem with which the inventor was concerned if a person having ordinary skill in the art would not reasonably be expected or motivated to look at the art. *In re Oetiker*, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). With regard to Applicant's invention, Applicant respectfully submits that it would not be reasonable to expect a person with ordinary skill to seek out the teachings disclosed in Scott et al. to attempt to solve the problem of playback of a simulated driver training exercise, where Scott et al. discloses a method for replaying video of recorded horse racing. Therefore, it would not be proper to combine the teachings of Aoki/Adam with non-analogous art such as Scott et al.. However, even if the combination would be proper, the combination does not make Applicant's invention

obvious, as none of the references teaches displaying the superimposed text of performance evaluation comments on the display as disclosed by Applicant's invention.

Claims 5-6

At item 5 of the Office Action, the Examiner rejected claims 5 and 6 under 35 USC § 103(a) as unpatentable over Adam et al./Aoki et al. in view of Copperman (US 5,474,453). In the rejection, the Examiner states that Copperman teaches a display unit reproducing a screen image at normal speed or pausing the replay, displaying a still-screen image at a selected riving situation and capable of fast-feeding replay or skipping replay. Further, the Examiner claims that Copperman discloses a driving simulation apparatus that is operable without any input from any person other than the student operator.

Applicant's Response

The Applicant disagrees with the rejection of claim 5 for the reasons presented above with respect to claim 1, from which claim 5 depends. In addition, Applicant disagrees that Copperman discloses or suggests the features recited in claim 5.

Upon review of Copperman, Applicant finds that Copperman discloses a system for development of a computer driving simulation. The passage cited by the Examiner as teaching a system capable of pausing to display a still screen (col. 16, lines 5-6 and 38-39) is actually a method for pausing the screen so that a developer can configure the simulation in preparation for use by a student operator. This is not actually a replay of a recorded real-time simulation. This is quite different than the disclosure of Applicant's invention wherein the image that is paused is a replay of a real-time simulation wherein the image is an actual recording of the simulation based on input from the student operator (paragraph [0022]).

Although Applicant does not believe that the combination of the references cited above

makes Applicant's invention obvious, in order to expedite prosecution of the application

Applicant has amended claim 5 to further define Applicant's invention over the references.

Specifically, claim 5 has been amended to include the limitation that the display unit reproduces an image recorded during a real-time simulation to distinguish the invention over the disclosure of Copperman where the pause and still images are used by a developer during development of a scenario and are not recorded from a real-time simulation. Thus, Applicant disagrees that the limitations of claim 5 are made obvious by Aoki/Adam as modified by Copperman '453.

With regard to claim 6, Applicant disagrees with the rejection of claim 6 for the reasons presented above with respect to claim 1, from which claim 6 depends. In addition, Applicant disagrees that Copperman discloses or suggests the features recited in claim 6.

Upon review of Copperman, Applicant finds that Copperman discloses a system that is operable by a developer programming a simulation (col. 16, line 3), and is not disclosed as part of a replay of a recorded data corresponding to an operator's simulated driving situation. Further as disclosed in claim 6 as related to claim 1, Applicant's invention relates to controlling a system that includes performance evaluation. The passage cited by the Examiner as teaching a system operated by a user (col 4, lines 32-33) refers to a driving simulator with no performance feedback capabilities and no replay mode. The Applicant's invention discloses operation by a user in both testing and replay modes (claim 6). Accordingly, Applicant submits that claim 6 of Applicant's invention is not made obvious by the combination of Adam/Aoki and Copperman.

Claims 7 and 10

At item 6 of the Office Action, the Examiner rejected claims 7 and 10 under 35 USC 103(a) as unpatentable over Aoki et al. (US 5,415,550) in view of Adam et al. (US 6,010,403) and Aoki et al. (JP 2002-297017).

In the rejection of claims 7 and 10, the Examiner states that Aoki et al. '550 discloses an electromechanical simulator 300 comprising a support frame 302, handle bar 308, pedal mechanism (inherent part of a motorcycle), a plurality of sensors (col. 5, lines 48-55), a processor (10 and/or 11), and a display screen 400 for displaying a simulated operating environment based on a real-time driving sequence controlled by a user. The Examiner further states that the '550 patent fails to disclose an apparatus that is capable of recording specific performance data and displaying the simulated operating environment and performance evaluation comments of a portion of the simulated operating experience where the operators responses fail to perform at a specified level. The Examiner goes on to claim that Adam et al. teaches a display screen that displays the simulated operating environment and performance evaluation comments when a portion of the driving route sequence where the operator has failed to perform at a prescribed level is replayed. The Examiner further states that Aoki et al. (JP 2002-297017) discloses a recorder that records specific performance data, and is capable of recording a specific performance of a real-time driving simulation and replaying the specific performance after the real-time driving simulation is completed. The Examiner contends that it would have been obvious to one of ordinary skill in the art to combine the recording and playback of Aoki (JP 2002-297017) with the disclosures of the '550 and '403 patents in order to memorize the game state and present the game state to other individuals.

Applicant's Response

The Applicant respectfully disagrees with the rejections of claims 7 and 10, specifically the simultaneous display of simulated operating environment and superimposed text of performance evaluation comments. Applicant respectfully submits that Adam et al. does not disclose displaying superimposed text of performance evaluation comments based on operator

input as disclosed by Applicant's invention, rather it discloses an audio commentary (col. 6, line 10-12). Applicant disagrees with the Examiner's claim that Adam et al. discloses a display unit that simultaneously displays the simulated operating environment and the performance evaluation comments when the driving simulation is replayed on the display unit, as claimed. In particular, Adam et al. does not disclose superimposing text or images comprising performance evaluation comments on the video image of the recording of the corresponding action by the rider during a simulated operation. Instead, Adam et al. clearly discloses that while the video image is replayed, there may be verbal commentary (col.6, lines 10-12), whereby the comments are spoken, not displayed. Applicant submits that the disclosure of audio commentary of Adam et al. teaches away from displaying superimposed text on the display during replay. Applicant respectfully submits that, as discussed above, teaching away is evidence of non-obviousness.

Further, Adam et al. does not teach replaying a driving route sequence for a situation where the operator has failed to achieve a specific level of performance. Rather, Adam et al. teaches displaying an alternative viewpoint from the one viewed by the operator (col. 6, lines 5-9) and it teaches that this alternative view is shown as it is happening, or shortly delayed (col. 6, lines 15-20). Put simply, Adam et al. teaches switching the viewpoint shown on the display from the one traditionally seen by the operator to an alternate viewpoint based on pre-determined interactive events or in other cases on a random basis (col. 6, lines 20-31) such that a viewer sees a live or slightly delayed alternate viewpoint.

Additionally, Applicant submits that Aoki '550 does not disclose system of selecting performance evaluation comments based on performance in relation to a specific performance criteria as claimed by Applicants invention, claim 7. Rather, Aoki '550 discloses a system wherein the operator's responses are graded and an evaluation is made SA13. Also, Aoki '550

discloses recording the entire riding simulation (col. 20, lines 46-50).

Applicant further disagrees with the Examiner's contention that Aoki (JP 2002-297017) discloses a recorder, which records operator performance data and is capable of replaying specific parts of the driving routine based on the performance data recorded. Applicant suggests that the correct reading of the JP 2002-297017 reference is that it teaches playback of the entire driving routine as described in paragraph [0057] of the machine translation of the subject publication. Thus, Applicant disagrees that the limitations of claim 7 are made obvious by the combination of Adam et al./Aoki et al. in view of Aoki et al. (JP 2002-297017), and respectfully requests reconsideration and withdrawal of the rejection. Applicant respectfully submits that as presently amended, claim 7 patentably distinguishes over all of the references of record. Further, Applicant submits that claim 10 which depends from claim 7, which includes all of the limitations thereof, is also in condition for allowance.

Claim 8

At item 7 of the Office Action, the Examiner rejected claim 8 under 35 USC § 103(a) as unpatentable over the combination of Aoki et al./Adam et al./Aoki et al. (JP 2002-297017) in view of Copperman (US 5,474,453). In the rejection, the Examiner states that the combination Aoki et al./Adam et al./Aoki et al. discloses the driving simulation apparatus of claim 7, but fails to disclose an apparatus operable without requiring input from any person other than the student operator during testing and replay, and claims that Copperman '453 teaches an apparatus that is operable without requiring input from any person other than the student operator during testing and replay.

Applicant's Response

The Applicant disagrees with the rejection of claim 8 for the reasons presented above

with respect to claim 7, from which claim 8 depends. Further, Applicant disagrees that Copperman '453 discloses a driving simulator apparatus that can be operated by a single person during replay as discussed with respect to claim 6 above, which contains the same limitations of claim 8. The word operable of claim 8 of Applicants invention refers to operation of the simulator during both real-time simulation and replay of the real-time simulation. Copperman '453 does not disclose operation by a single operator in both of these modes in the claims as stated by the Examiner. Thus, Applicant disagrees that the limitations of claim 8 are made obvious by the combination of Adam et al./Aoki et al./Aoki et al. (JP 2002-297017) in view of Copperman, and respectfully requests reconsideration and withdrawal of the rejection.

Claim 9

At item 8 of the Office Action, the Examiner rejected claim 9 under 35 USC § 103(a) as unpatentable over the combination of Aoki et al./Adam et al./Aoki et al. (JP 2002-297017) in view of Copperman (US 5,660,547). In the rejection, the Examiner states that the combination Aoki et al./Adam et al./Aoki et al. discloses the driving simulation apparatus of claim 7, but fails to disclose wherein input devices perform a first set of functions during real-time simulation and a second set of functions during replay of a recorded real-time simulation. The Examiner that "dual function" input devices are disclosed by Copperman '547.

Applicant's Response

The Applicant disagrees with the rejection of claim 9 for the reasons presented above with respect to claim 7, from which claim 9 depends. Applicant disagrees with the Examiner's characterization of Copperman as teaching a set of input devices with a dual functionality. Copperman '547 discloses a plurality of input devices 104-112 (Fig. 1), including a turn signal lever 104, dashboard switches 105, brake pedal 106, key ignition 107, gas pedal 108,

transmission shifter 110, and steering wheel 112, used by a user to navigate through the simulated environment, as well as rocker switches 182, 184, 186 which permit a user to move within and select between various menu choices and or end a simulation or development sequence. The Applicant submits that in all cases Copperman uses the input devices 104-112 to navigate through the simulated environment, and in all cases uses the rocker switches 182, 184, 186 to make selections from various menus. Thus, Copperman does not teach using input devices 104-112 to control the replay of the real-time simulation. In fact, Copperman discloses that once the real-time simulation is complete and the abort switch 186 has been manipulated that control of the system (including replay) is performed by the operator via a personal computer 103 which was not used as a control during the real-time simulation. (col. 13, lines 50-64). Applicant submits that this dual control system requiring two different types of input actually teaches away from the disclosure of claim 9 of Applicant's invention wherein the system can be controlled by one set of input devices regardless of the operating state of the system. Applicant respectfully submits that, as discussed above, teaching away is evidence of non-obviousness. For the reasons put forth above Applicant disagrees that the limitations of claim 9 are made obvious by the combination of Adam et al./Aoki et al./Aoki et al. (JP 2002-297017) in view of Copperman '547, and respectfully requests reconsideration and withdrawal of the rejection.

Claims 11 and 13

At item 9 of the Office Action, the Examiner rejected claims 11 and 13 under 35 USC § 103(a) as unpatentable over Yamasaki et al. (US 5,547,382) in view of Aoki et al. (US 5,415,550) and Adam et al. (US 6,010,403). In the rejection, the Examiner states that Yamasaki discloses step a) generating a driving simulation course including a plurality of testing situations

(col. 2, lines 47-53) and step b) recording the operator's real-time responses to each testing situation (abstract). The Examiner claims that Aoki et al. '550 discloses step c) comparing the operator's response to prerecorded base line data (col. 20, lines 51-66) and that Adam et al. '403 discloses step d) replaying selected scene from the simulation superimposed with selected performance evaluation comments for each situation in which the operator's responses fail to reach a specified performance level (col. 5, line 6 – col. 6, line 12).

Applicant's Response

Applicant disagrees that the disclosure of Yamasaki, as modified by the teachings of Aoki et al. '550 and Adam et al. '403 make obvious Applicant's invention. Applicant disagrees with the rejection of claim 11 for the reasons presented above with respect to claim 7 as it has contains substantially the same limitation as recited in step c). Additionally, Applicant disagrees with the rejection of claim 11 for the reasons presented above with respect to claim 1 as it has contains substantially the same limitation as recited in step d), specifically the reference does not disclose superimposing text on images during replay of the simulation.

Applicant finds that Yamasaki discloses a riding simulation system with a display means, a moving means to impart running characteristics to the simulator vehicle and a control means for the operator to input vehicle controls to the simulation (col. 2, lines 52-57). The simulation system is capable of recording and reproducing driving conditions and operator input. (col. 2, lines 57-60). The Applicant disagrees that Yamasaki discloses generating a prerecorded driving simulation as claimed. The common definition of generate is "to bring into existence" (<http://www.m-w.com/dictionary/generate>) which implies creating or producing. The disclosure of Yamasaki does not teach any method of creating, producing or generating a driving simulation. The entire disclosure of Yamasaki discloses a method for utilizing a driving

simulation including describing various operator inputs to defining how these inputs are interpreted by the computer. Further the disclosure teaches a physical construction of a system but there is no mention of a method of generating the driving simulation under the plain meaning of the word. According to MPEP § 2111.01, the words of the claim must be given their plain meaning. Ordinary, simple English words whose meaning is clear and unquestionable, absent any indication that their use in a particular context changes their meaning, are to be construed to mean exactly what they say. Applicant suggests that the Examiner's interpretation of the word generating is not in accordance with MPEP § 2111.01. For the reasons put forth above Applicant disagrees that the limitations of claim 11 are made obvious by the combination of Yamasaki et al. in view of Aoki et al. and Adam et al., and respectfully requests reconsideration and withdrawal of the rejection. Should claim 11 be found patently distinguishable, Applicant submits that claim 13 which is dependent upon claim 11 is in condition for allowance as well.

Claim 12

At item 10 of the Office Action, the Examiner rejected claim 12 under 35 USC § 103(a) as unpatentable over Yamasaki et al. (US 5,547,382) / Aoki et al. (US 5,415,550) / Adam et al. (US 6,010,403) and further in view of Copperman (US 5,474,453). In the rejection, the Examiner states that Yamasaki et al. / Aoki et al. / Adam et al. disclose the method of claim 11, but fail to disclose that the method is performable without requiring input from any person other than the student operator during testing and replay, and considers Copperman '453 to teach an apparatus that is operable without requiring input from any person other than the student operator during testing and replay.

Applicant's Response

The Applicant disagrees with the rejection of claim 12 for the reasons presented above

with respect to claim 11, from which claim 12 depends. Additionally, Applicant disagrees with the rejection of claim 12 for the reasons presented above with respect to claim 6 regarding the limitation that the method is performable with input from any person other than the student during testing and replay.

Claim 14

At item 11 of the Office Action, the Examiner rejected claim 14 under 35 USC § 103(a) as unpatentable over Yamasaki et al. (US 5,547,382) / Aoki et al. (US 5,415,550) / Adam et al. (US 6,010,403) and further in view of Scott et al. (US 2004/009812). In the rejection, the Examiner states that Yamasaki et al. / Aoki et al. / Adam et al. disclose the method of claim 11, but fail to disclose a wherein the replay is paused to display a still-screen image. The Examiner cites Scott et al. as teaching a replay that can be paused to display a still-screen image.

Applicant's Response

The Applicant disagrees with the rejection of claim 13 for the reasons presented above with respect to claim 11, from which claim 13 depends. Specifically, as discussed above in the discussion of claim 1, the disclosure of Adam et al. does not teach a superimposed text displayed on a relay image as claimed. Further for the reasons presented above with respect to claim 4. Applicant does not agree that Scott et al. is analogous art.

Thus, Applicant disagrees that the limitations of claim 13 are made obvious by Yamasaki et al. / Aoki et al. / Adam et al. and further in view of Scott et al., and respectfully requests reconsideration and withdrawal of the rejection.

Claim 15 and 16

At item 12 of the Office Action, the Examiner rejected claims 15 and 16 under 35 USC § 103(a) as unpatentable over Adam et al. (US 6,010,403) in view of Aoki et al. (JP 2002-297017),

Aoki et al. (US 5,415,550) and Copperman (US 5,660,547). In the rejection, the Examiner states that Adam et al. discloses a real-time driving simulation apparatus with a selector that selects from a pre-stored selection of performance evaluation comments based on operator input with a display the simultaneously displays the simulated operating environment and the performance evaluation comments. Further, the Examiner claims that Adam et al. discloses playback of a real-time simulation. The Examiner claims that Aoki et al. (JP 2002-297017) discloses recording and replaying the real-time driving simulation. The Examiner claims that Aoki et al. '550 discloses input devices operated by the user during the real-time simulation. Lastly, the Examiner claims that Copperman discloses input devices that perform a first set of functions during real-time driving simulation and a second set of functions during replay of a recorded real-time driving simulation.

Applicant's Response

The Applicant disagrees with the rejection of claims 15 and 16 for the reasons previously presented. Specifically, Adam et al. does not disclose a simultaneous display of superimposed text and image during replay of a real-time driving simulation as discussed with respect to claim 1 above. Additionally, Copperman does not disclose a set of input devices capable of performing different a first and second set of functions during real-time simulation and replay respectively as discussed with respect to claim 9 above. Thus, Applicant disagrees that the limitations of claim 15 are made obvious by Adam et al. in view of Aoki et al., Aoki et al. '550 and Copperman and respectfully requests reconsideration and withdrawal of the rejection. Further, Applicant submits that claim 16 which is dependent upon claim 15 will be allowable should the Examiner find that claim 15 is patentably distinguishable over the prior art.

Applicant respectfully wishes to call the Examiner's attention to some relevant cases of the U.S. Court of Appeals for the Federal Circuit (CAFC) which give helpful guidance in determining what is considered obvious in relation to prior art references. The CAFC was established in 1982 to bring national standards, and a certain level of conformity and continuity to Federal patent case law. Decisions of the Federal Circuit are relevant and helpful in giving guidance to patent practitioners, as well as to the personnel of the U.S. Patent and Trademark Office. The CAFC has stated that:

In order to determine obviousness as a legal matter, four factual inquiries must be made concerning: 1) the scope and content of the prior art; 2) the level of ordinary skill in the art; 3) the differences between Applicant's invention and the prior art; and 4) secondary considerations of nonobviousness, which in case law is often said to include commercial success, long-felt but unresolved need, failure of others, copying, and unexpected results. *Graham v. John Deere Co.*, 383 U.S. 1, 17-18, 148 USPQ 459, 467 (1966); *Miles Labs, Inc. v. Shandon, Inc.*, 997 F.2d 870, 877, 27 USPQ2d 1123, 1128 (Fed. Cir. 1993).

Applicant respectfully suggests that the differences between the applicant's invention, as claimed, and the teachings of the cited references are significant and substantial as outlined herein, such that the claimed invention is not obvious as compared with the references. Applicant therefore requests reconsideration and withdrawal of the rejections of record.

Other Matters

Applicant has amended claim Claims 1, 7, 11 and 15 are amended herein to include the limitation that the replay displays superimposed written text over the replay image. This recitation is fully supported by Figs. 10-13. Applicant submits that this amending the claims to include this limitation does not change or limit the scope of the invention but more explicitly and definitely claims the subject matter of the invention. Additionally, Applicant has amended claim 5 to include the limitation that the replayed real-time simulation is recorded during a real-time simulation. This similarly, this does not change the scope of the claim but more explicitly defines the subject matter of the invention and further defines the invention over the references. Applicant respectfully submits that these amendments are clearly supported in the specification, whereby no new matter is added to the application.

Conclusion

In conclusion, Applicant has overcome the Examiner's rejections of record. While Applicant has considered all of the references of record, it is respectfully submitted that the interactive driving simulation apparatus as defined by the present claims, is believed to be allowable over all of the prior art of record.

If the Examiner is not fully convinced of the allowability of all of the claims now in the application, Applicant respectfully requests that the Examiner telephonically contact Applicant's undersigned representative to expeditiously resolve prosecution of the application.

A Request for Continued Examination (RCE) is submitted concurrently with this Amendment B.

Favorable consideration is respectfully requested.

Respectfully submitted,



Customer No. 21828
Carrier, Blackman & Associates, P.C.
24101 Novi Road, Suite 100
Novi, Michigan 48375
October 05, 2007

William Blackman
Attorney for Applicant
Registration No. 32,397
(248) 344-4422

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